

# EXHIBIT F.4

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE BAUER PLAINTIFFS’  
THIRD REQUEST TO PRODUCE DOCUMENTS AND THINGS  
(Nos. 26-30)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Dr. Alan J. Bauer, Revital Bauer, Yehonathon Bauer, Binyamin Bauer, Daniel Bauer and Yehuda Bauer (“Plaintiffs”), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs’ counsel within 30 days of the service of these requests.

**INSTRUCTIONS AND GENERAL DEFINITIONS**

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

**SPECIFIC DEFINITIONS**

1. “PA” means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. “PA Martyr Form and File” in respect to any deceased or injured person, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Social Affairs, or any predecessor or successor entity thereto. The documents produced by defendants as Bates 02:006827-34 are an illustrative example of a PA Martyr Form and File.

5. “PA Prisoner Form and File” in respect to any person who is or was a prisoner, means and refers to the complete paper form and file regarding that person from the PA’s Ministry of Prisoner Affairs, or any predecessor or successor entity thereto. The existence of PA Prisoner Forms and Files was confirmed in the deposition of Jawad Amawi in the matter of *Klieman v. Palestinian Authority* at pp. 51; 64.

6. “PLO Martyr File” in respect to any deceased or injured person, means and refers to the complete paper file from the PLO’s Social Affairs Institution, or any predecessor or successor entity thereto. The existence of PLO Martyr Files is evidenced by the document produced by defendants in the matter of *Gilmore v. Palestinian Authority* as Bates 06:000086.

7. “PSS” means and refers to the PA’s Preventive Security Service.

8. “GIS” means and refers to the PA’s General Intelligence Service.

9. “NSF” means and refers to the PA’s National Security Forces.

10. “MI” means and refers to the PA’s Military Intelligence.

11. “Force 17” means and refers to PA’s Presidential Security Force.

12. “PAP” means and refers to the PA’s civil police force.

13. The “Terrorist Attack” means and refers to the March 21, 2002, terrorist bombing attack from which the Plaintiffs’ action arises.

**REQUESTS FOR DOCUMENTS AND THINGS**

26. All documents concerning Mohammed Hashaika (“Hashaika”), including without limitation:

a. The complete personnel files for Hashaika from all positions and jobs held by Hashaika in the PA and/or PLO and from all work and employment performed by Hashaika for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Hashaika in the PA and/or PLO and of all work and employment performed by Hashaika for the PA and/or PLO, between January 1, 2000 and the date of his death; (ii); the rank or ranks held by Hashaika between January 1, 2000 and the date of his death, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Hashaika held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Hashaika between January 1, 2000 and the date of his death.

d. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of the PSS.

e. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of the GIS.

f. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of the NSF.

g. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of the MI.

h. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of Force 17.

i. All documents concerning Hashaika in the paper, computerized, electronic or other files or archives of the PAP.

j. All broadcasts on PA TV concerning Hashaika.

27. All documents concerning Nasser Shawish ("Shawish"), including without limitation:

a. The complete personnel files for Shawish from all positions and jobs held by Shawish in the PA and/or PLO and from all work and employment performed by Shawish for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Shawish in the PA and/or PLO and of all work and employment performed by Shawish for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Shawish between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Shawish held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Shawish between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Shawish and/or Shawish's relatives by the PA and/or PLO at any time after the Terrorist

Attack, in relation to, as a result of and/or due to Shawish's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Shawish.

e. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Shawish in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Shawish, including without limitation a complete copy of the broadcast referenced in the document disclosed to defendants by plaintiffs by email at 11:58 AM on November 19, 2012.

28. All documents concerning Abdel Karim Aweis ("Aweis"), including without limitation:

a. The complete personnel files for Aweis from all positions and jobs held by Aweis in the PA and/or PLO and from all work and employment performed by Aweis for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Aweis in the PA and/or PLO and of all work and employment performed by Aweis for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Aweis between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Aweis held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Aweis between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Aweis and/or Aweis's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Aweis's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Aweis.

e. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Aweis in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Aweis.

29. All documents concerning Sana'a Shehadeh ("Shehadeh"), including without limitation:

a. The complete personnel files for Shehadeh from all positions and jobs held by Shehadeh in the PA and/or PLO and from all work and employment performed by Shehadeh for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Shehadeh in the PA and/or PLO and of all work and employment performed by Shehadeh for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Shehadeh between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Shehadeh held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Shehadeh between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Shehadeh and/or Shehadeh's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Shehadeh's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Shehadeh.



e. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Shehadeh in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Shehadeh.

30. All documents concerning Kahira Saadi (“Saadi”), including without limitation:

a. The complete personnel files for Saadi from all positions and jobs held by Saadi in the PA and/or PLO and from all work and employment performed by Saadi for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Saadi in the PA and/or PLO and of all work and employment performed by Saadi for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Saadi between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Saadi held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Saadi between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Saadi and/or Saadi's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Saadi's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Saadi.

e. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of the MI.

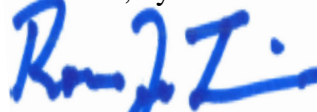
i. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Saadi in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Saadi.

November 21, 2012

Plaintiffs, by their Attorney,



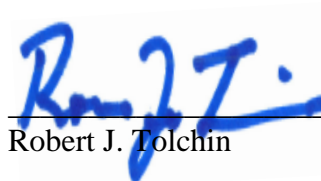
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**CERTIFICATION**

I hereby certify that on November 21, 2012, I caused the within to be served by electronic mail and by hand on the counsel listed below:

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